


ORIGINAL

Approved:


Matthew Weinberg
Assistant United States Attorney

Before:

THE HONORABLE GABRIEL W. GORENSTEIN
United States Magistrate Judge
Southern District of New York

23mj5988

23 MAG 5988

UNITED STATES OF AMERICA

v.

BEILIN XU,

Defendant.

COMPLAINT

Violation of 21 U.S.C. § 846

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

Ryan Madden, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE

(Conspiracy to Distribute Controlled Substances)

1. From at least in or about March 2023, up to and including the present, in the Southern District of New York and elsewhere, BEILIN XU, the defendant, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

2. It was a part and an object of the conspiracy that BEILIN XU, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were (i) 50 grams and more of mixtures and substances containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A), and (ii) mixtures and substances containing a detectable amount of ketamine, in violation of Title 21, United States Code, Section 841(b)(1)(E).

(Title 21, United States Code, Section 846.)

The bases for my knowledge of the foregoing charge are, in part, as follows:

4. I am a Special Agent with HSI and have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law

enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

5. Since at least March 2023, HSI and other law enforcement agencies, including the United States Postal Inspection Service (“USPIS”) and New York City Police Department (“NYPD”), have been investigating the distribution of controlled substances through an online dark web marketplace called Archetyp, and specifically by a particular vendor (“Vendor-1”) on Archetyp. Vendor-1 advertises itself on Archetyp as “purveyors of high quality Ketamine, Methamphetamine & Cocaine products.”

6. Vendor-1 ships controlled substances to customers around the country by United States Postal Service (“USPS”) Priority Mail. In most instances, Vendor-1 ships controlled substances from a particular post office located in Flushing, Queens (“Flushing Post Office-1”). On other occasions, however, Vendor-1 has shipped controlled substances from a different post office, also located in Flushing, Queens (“Flushing Post Office-2”).

7. BEILIN XU, the defendant, distributes controlled substances on behalf of Vendor-1, including by dropping off packages containing controlled substances for mailing. XU and a co-conspirator (“CC-1”) conduct business on behalf of Vendor-1 out of a particular apartment unit (the “Apartment Unit”) on the ninth floor of an apartment building in Flushing, Queens (the “Apartment Building”).

8. Between on or about February 25, 2023 and on or about July 26, 2023, individuals working for Vendor-1 shipped more than 2,000 USPS Priority Mail packages to locations around the United States. As described below, law enforcement agents have identified at least five of those packages as containing controlled substances, including at least four containing methamphetamine and at least one containing ketamine. In the course of this investigation, law enforcement agents have seized approximately 300 grams of methamphetamine and three grams of ketamine from packages sent by Vendor-1.

Terminology

9. Based on my training, research, education, and experience, I am familiar with the following relevant terms:

a. The “dark web,” also sometimes called the “dark net,” is a colloquial name for a number of extensive and widely used criminal marketplaces operating on the Internet, which allow customers to buy, and “vendors” to sell, illegal items, such as drugs, firearms, and other hazardous materials with greater anonymity than is possible on the traditional Internet. These online market websites use a variety of technologies, including the Tor network (defined below) and other encryption technologies, to ensure that communications and transactions are shielded from interception and monitoring.

b. “Vendors” are the dark web’s sellers of goods and services, often of an illicit nature, and they do so through the creation and operation of “vendor accounts.” Customers, meanwhile, operate “customer accounts.” It is possible for the same person to operate one or more customer accounts and one or more vendor accounts at the same time.

c. The “Tor network,” or simply “Tor,” is a special network of computers on the Internet, distributed around the world, that is designed to conceal the true Internet Protocol (“IP”) addresses of the computers accessing the network, and, thereby, the locations and identifies of the network’s users. Tor likewise enables websites to operate on the network in a way that conceals the true IP addresses of the computer servers hosting the websites, which are referred to as “hidden services” on the Tor network. Such “hidden services” operating on Tor have complex web addresses, generated by a computer algorithm, ending in “.onion” and can only be accessed through specific web browser software, including a major dark web browser known as “Tor Browser,” designed to access the Tor network.

d. “Monero” is an online digital currency, commonly referred to as a cryptocurrency, that allows users to transfer funds more anonymously than would be possible through traditional banking and credit systems. Users store their Monero and other cryptocurrency in digital “wallets,” which are identified by unique electronic “addresses.” Monero’s value, much like other cryptocurrencies, is considerably more volatile than that of fiat currencies.

Vendor-1 Advertises Itself as a Purveyor of Controlled Substances on the
Dark Web Marketplace Archetyp

10. Based on my participation in this investigation, my training and experience, my conversations with other law enforcement agents and witnesses, and my review of Internet websites used to conduct narcotics trafficking, I have learned, among other things, the following:

a. Archetyp is a dark web market on which vendors sell narcotics and other controlled substances. While other dark web markets often facilitate the sale of other contraband, such as stolen credit card numbers and counterfeit identity documents, Archetyp proclaims itself to be a “drugs only” market. Payment for goods purchased on Archetyp must be made in the cryptocurrency Monero.

b. Vendor-1 is a vendor on Archetyp. The Vendor-1 vendor page on Archetyp states that Vendor-1 joined Archetyp as a vendor on February 26, 2023. Vendor-1 advertises itself as “purveyors of high quality Ketamine, Methamphetamine & Cocaine products” and states that it ships “USPS priority Monday – Friday, with a 12pm EST cut off time for same day drop off.”

Law Enforcement Agents Order Methamphetamine from Vendor-1 on Three Occasions

11. Based on my participation in this investigation, including my communications with other law enforcement agents, my personal observations, and my review of law enforcement reports and records, I know the following with respect to three purchases of methamphetamine from Vendor-1 on Archetyp made by law enforcement agents acting in an undercover capacity (each individually a “UC Purchase” and, collectively, the “UC Purchases”):

The March 30 UC Purchase

a. On or about March 30, 2023, a law enforcement agent using an undercover account on the Archetyp market (“UC Account-1”) placed an order with Vendor-1 for 50 grams of what Vendor-1 advertised as “Top Quality Crystal Meth.” The UC Account-1 paid \$600 for the 50 grams of “Top Quality Crystal Meth,” plus \$10 for USPS Priority Flat Rate shipping. The UC Account-1 paid for the transaction using the cryptocurrency Monero.

b. The UC Account-1 ordered the “Top Quality Crystal Meth” to be shipped to a particular location in Manhattan, New York (“Address-1”).

c. On or about April 3, 2023, a package (“Package-1”) arrived at Address-1. The return address information listed on Package-1 identified a particular individual (“Individual-1”) and address in Flushing, New York (“Flushing Mailing Address-1”) as the sender.

d. Inside Package-1 was a white box. Inside the white box were two clear plastic bags containing a crystallized substance. The crystallized substance field-tested positive for methamphetamine hydrochloride and weighed approximately 52.3 grams.

The April 25 UC Purchase

e. On or about April 25, 2023, a law enforcement agent using an undercover account on the Archetyp market (“UC Account-2”) placed an order with Vendor-1 for 10.5 grams of what Vendor-1 advertised as “Top Quality Crystal Meth.”¹ UC Account-2 paid approximately \$156 for the 10.5 grams of “Top Quality Crystal Meth” plus \$30 for USPS Priority Flat Rate shipping. The UC Account-2 paid for the transaction using the cryptocurrency Monero.

f. The UC Account-2 ordered the “Top Quality Crystal Meth” to be shipped to a particular location in Manhattan, New York (“Address-2”).

g. On or about April 28, 2023, a package (“Package-2”) arrived at Address-2. The return address information listed on Package-2 identified individual-1 and Flushing Mailing Address-1 as the sender – i.e., the same return address information included on Package-1.

h. Inside Package-2 was a white box. Inside the white box was a metallic black case inside of bubble wrap. Inside of the black case was one clear plastic bag containing a crystallized substance. The crystallized substance field-tested positive for methamphetamine hydrochloride and weighed approximately 11.9 grams.

The May 18 UC Purchase

i. On or about May 18, 2023, a law enforcement agent used the UC Account-2 to place an order with Vendor-1 on the Archetyp market for approximately 228 grams of “Top

¹ At the time of the April 25 UC Purchase, Vendor-1 was offering “crystal meth” in “packs” of the following quantities: 2 grams, 3.5 grams, 7 grams, 14 grams, 28 grams, 50 grams, 75 grams, and 100 grams. In order to purchase 10.5 grams, the UC Account-2 purchased three “packs” of 3.5 grams.

Quality Crystal Meth.”² The UC Account-2 paid \$2,418 for the approximately 228 grams of “Top Quality Crystal Meth,” plus \$60 for USPS Priority Flat Rate shipping. The UC Account-2 paid for the transaction using the cryptocurrency Monero.

j. The UC Account-2 ordered the “Top Quality Crystal Meth” to be shipped to a particular location in Manhattan, New York (“Address-3”).

k. On or about May 19, 2023, two packages (“Package-3” and “Package-4”) arrived at Address-3. The return address information listed on Package-3 and Package-4 identified Individual-1 and another address in Flushing, New York (“Flushing Mailing Address-2”) as the sender – i.e., the same sender name as Package-1 and Package-2, but a different address in Flushing.

l. Package-3 and Package-4 each contained a brown box with black dots. Inside the brown box in each package was a rainbow-colored plastic bag containing a crystallized substance.

m. The substance in Package-3 tested positive for methamphetamine hydrochloride and weighed approximately 100 grams of methamphetamine. The substance in Package-4 tested positive for methamphetamine hydrochloride and weighed approximately 129 grams of methamphetamine.

Law Enforcement Agents Seize a Package Containing Ketamine in June 2023

12. Based on my participation in this investigation, including my communications with other law enforcement agents, my personal observations, and my review of law enforcement reports and records, I know the following with respect to a seizure of a package by law enforcement agents from Flushing Post Office-1 in June 2023:

a. On or about June 8, 2023, law enforcement agents conducting physical surveillance outside of Flushing Post Office-1 observed CC-1 carrying two large bags containing numerous white cardboard boxes that appeared to be USPS packages. Law enforcement agents observed CC-1 enter Flushing Post Office-1 and drop off the packages for shipment (the “June 8 Packages”).

b. After observing CC-1 drop off the June 8 Packages, law enforcement agents intercepted one of the June 8 Packages (“Package-5”). Law enforcement agents observed that the return address information listed on Package-5 identified Individual-1 as the sender – that is, the same individual who was listed as the sender on Package-1, Package-2, Package-3, and Package-4, each of which had been purchased by law enforcement agents through a UC Buy and each of which had contained methamphetamine. The return address listed on Package-5 identified an address in Flushing as the shipping address (“Flushing Mailing Address-3”).

² At the time of the May 18 UC Purchase, Vendor-1 was offering “crystal meth” in “packs” of the following quantities: 2 grams, 3.5 grams, 7 grams, 14 grams, 28 grams, 50 grams, 75 grams, and 100 grams. In order to purchase 228 grams, the UC Account-2 purchased two “packs” of 100 grams and one “pack” of 28 grams.

c. On or about June 21, 2023, United States Magistrate Judge Sarah Netburn signed a warrant authorizing the search and seizure of Package-5. After opening Package-5 pursuant to that warrant, law enforcement agents identified one clear plastic baggie containing a white powder substance. The substance field-tested positive for ketamine hydrochloride and weighed approximately three grams.

13. Based on my review of postal records and images from Flushing Post Office-1, I know that, on or about June 8, 2023, there were approximately 29 packages sent from Flushing Post Office-1 which identified Individual-1 and Flushing Mailing Address-3 as the return address information and which were processed within approximately five minutes of each other. In other words, there were 29 packages among the June 8 Packages.

Vendor-1 Uses an Online Shipping Platform to Arrange the Mailing of its Packages

14. Based on my training and experience and review of a website for an online shipping platform which helps facilitate the mailing of packages by USPS (the “Online Shipping Platform”), I know that private individuals and companies can sign up for an account with the Online Shipping Platform. Users of the Online Shipping Platform can order USPS postage and shipping labels and arrange for shipping of packages via the Online Shipping Platform such that the only remaining step to effectuate the shipment is to physically place the package in the mail.

15. In the course of this investigation, law enforcement agents have identified an account with the Online Shipping Platform which is used by Vendor-1 (the “Vendor-1 Online Shipping Account”). Specifically, based on my review of postal records and records from the Online Shipping Platform, I know the following:

a. The Vendor-1 Online Shipping Account was created on or about February 24, 2023 – that is, approximately two days before Vendor-1 joined Archetyp as a vendor.

b. The Vendor-1 Online Shipping Account has saved several “Ship From Addresses” – that is, addresses that have been saved by the user of the account to facilitate the preparation of mailing labels with those addresses as the return address. Among the saved “Ship from Addresses” is Flushing Mailing Address-1 and Flushing Mailing Address-2 – that is, the return addresses listed on Package-1 and Package-2 (in the case of Flushing Mailing Address-1) and Package-3 and Package-4 (in the case of Flushing Mailing Address-2).

c. USPS records reflect that, between on or about February 25, 2023 and on or about July 26, 2023, the Vendor-1 Online Shipping Account arranged for the mailing of more than 2,000 packages to locations around the United States, including Package-1, Package-2, Package-3, Package-4, and Package-5. Of the packages arranged for mailing by the Vendor-1 Online Shipping Account, at least 1,700 were shipped from Flushing Post Office-1, and at least 100 were shipped from Flushing Post Office-2.

BEILIN XU and CC-1 Conduct Business on Behalf Of Vendor-1 from the Apartment Unit

16. Through a review of internet protocol (“IP”) address information, video surveillance footage, and physical surveillance, law enforcement agents have identified the Apartment Unit – located within the Apartment Building, which is a 15-story apartment building

in Flushing – as a location from where Vendor-1 is operated. The Apartment Building is approximately one mile away from Flushing Post Office-1 and a half mile away from Flushing Post Office-2. As explained below, BELIN XU, the defendant, and CC-1 reside in and/or otherwise uses the Apartment Unit in connection with the operation of Vendor-1.

17. Based on my review of records from the Online Shipping Platform, I have identified a list of IP addresses which have been used to access the Vendor-1 Online Shipping Account. Based on my review of records from an internet service provider, I know that at least five IP addresses which were used to access the Vendor-1 Online Shipping Account during May 2023 are associated with the Apartment Unit. In addition, based on my review of postal records and communications with other law enforcement agents, I know that one of the IP addresses associated with the Apartment Unit tracked at least 19 packages through USPS's online package tracking system that had been arranged for mailing through the Vendor-1 Online Shipping Account. Of the 19 packages tracked by the IP address associated with the Apartment Unit, 18 had Flushing Mailing Address-2 listed as the mailing address – that is, the same return mailing address listed on Package-3 and Package-4.

18. Based on my participation in this investigation, I know that law enforcement agents have conducted physical surveillance outside of the Apartment Building on approximately four occasions between on or about June 8, 2023 and July 26, 2023, and have also reviewed approximately 20 hours of video surveillance footage from approximately six separate days between on or about June 13, 2020 and on or about July 20, 2023. Based on my personal observations, review of law enforcement records, and communications with other law enforcement agents, I know that law enforcement agents have physically observed and/or reviewed surveillance camera footage from the Apartment Building showing BEILIN XU, the defendant, and CC-1 leaving the Apartment Building carrying bags containing white cardboard boxes which resemble USPS packages and/or returning to the Apartment Building containing empty bags. In addition, based on my review of postal records, I know that, within 20 minutes of observing XU and/or CC-1 exiting the Apartment Building carrying the white cardboard boxes, packages were dropped off at Flushing Post Office-1 on behalf of the Vendor-1 Online Shipping Account. For example:

June 8, 2023 Surveillance

a. On or about June 8, 2023 – that is, the day that law enforcement agents intercepted Package-5 from the June 8 Packages, as described *supra* paragraphs 12-13, at approximately 7:30 p.m., video surveillance footage from the Apartment Building shows CC-1 entering the elevator on the ninth floor of the Apartment Building and carrying two bags containing white cardboard boxes that appear to be USPS packages. CC-1 rode the elevator down to the lobby and exited the Apartment Building.

b. At approximately 7:41 p.m., law enforcement agents conducting physical surveillance outside of Flushing Post Office-1 observed CC-1 arrive at the post office. At approximately 7:42 p.m., CC-1 approached a self-service kiosk inside Flushing Post Office-1 and mailed the June 8 Packages. As noted *supra* paragraph 13, CC-1 dropped off 29 packages for mailing on June 8.

c. After CC-1 dropped off the June 8 Packages, law enforcement agents observed CC-1 walk to a pharmacy less than a half mile away from Flushing Post Office-1 and

purchase a prepaid gift card. Law enforcement agents then observed CC-1 return to the Apartment Building.

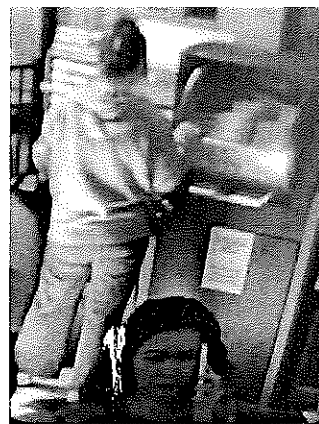
June 13, 2023 Surveillance

d. On or about June 13, 2023, at approximately 2:45 p.m., law enforcement agents conducting physical surveillance observed an individual identified as XU leaving the Apartment Building carrying what appeared to be cardboard boxes. Video surveillance footage from the Apartment Building depicts that, at approximately 2:45 p.m., XU entered the elevator of the Apartment Building on the ninth floor carrying a black bag which appeared to contain white cardboard boxes that resemble USPS packages. Below is a still image from the video surveillance footage reflecting XU in the elevator with the bag containing the white cardboard boxes.



e. Law enforcement agents conducting physical surveillance thereafter observed XU exit the Apartment Building and enter the back seat of a vehicle which, based on its license plates, I understand to be a taxi. That vehicle then drove in the direction of Flushing Post Office-1.

f. Approximately 20 minutes later, shortly after 3:00 p.m., XU was captured by surveillance camera footage at Flushing Post Office-1 using the self-service kiosk to drop off packages. Below are still images from that surveillance camera footage.



g. Based on my review of postal records, I know that, on or about June 13, 2023, around the time that BEILIN XU, the defendant, was captured on video surveillance footage at Flushing Post Office-1 dropping off packages at the self-service kiosk, approximately 21 USPS packages were sent by the Vendor-1 Online Shipping Account from Flushing Post Office-1 to locations around the country.

July 20 Surveillance

h. On or about July 20, 2023, law enforcement agents conducting physical surveillance observed an individual identified as CC-1 leaving the Apartment Building carrying what appeared to be cardboard boxes. Based on my review of postal records, I know that packages using the Vendor-1 Online Shipping Account were dropped off for mailing at Flushing Post Office-1 within 20 minutes of CC-1's departure from the Apartment Building with the bags.

Video Surveillance from Flushing Post Office-1

19. Based on my and other law enforcement agents' review of video surveillance footage from Flushing Post Office-1, I know that, on at least 40 occasions, CC-1 has been identified on surveillance footage at Flushing Post Office-1 dropping off packages at the same time that postal records reflect that packages using the Vendor-1 Online Shipping Account were dropped off at Flushing Post Office-1. Similarly, on at least 15 occasions, the individual depicted above and identified as BEILIN XU, the defendant, has been identified on surveillance footage at Flushing Post Office-1 dropping off packages at the same time that postal records reflect that the Vendor-1 Online Shipping Account dropped off packages at Flushing Post Office-1. For example, the below left photograph depicts CC-1 dropping off packages at the self-service kiosk of Flushing Post Office-1 on June 5, 2023. The below photograph depicts XU dropping off packages at the self-service kiosk of Flushing Post Office-1 on June 2, 2023.



20. Based on my review of surveillance footage from Flushing Post Office-1, I know that BEILIN XU, the defendant, and CC-1 have also been observed together at Flushing Post Office-1 while dropping off packages at the same time that postal records reflect that packages using the Vendor-1 Online Shipping Account were dropped off at Flushing Post Office-1. For example, the below photograph is a still image from the video surveillance footage from June 2, 2023 taken shortly after the still image of XU depicted immediately above, i.e., *supra* paragraph 19. The photograph depicts XU and CC-1 next to each other at the self-service kiosk. Below that photograph are two photographs taken from the video surveillance footage on July 3, 2023. The

photograph on the left shows CC-1 at the self-service kiosk while XU stands behind him, carrying a blue bag. The photograph on the right shows XU, shortly thereafter, at the self-service kiosk.



Identification of BEILIN XU

21. As described in further detail below, law enforcement agents have identified BEILIN XU, the defendant, as the individual depicted *supra* paragraphs 18.d, 18.f, 19, 20, exiting the Apartment Building with packages and mailing packages at Flushing Post Office-1 on behalf of Vendor-1.

22. Based on my review of cargo importation records maintained by Customs and Border Patrol (“CBP”), I know that, between on or about May 2, 2022 and in or about July 5, 2023, there have been approximately 20 shipments of cargo originating from outside the United States which identified “Beilin Xu” as the consignee – i.e., the recipient of the shipments – and listed the Apartment Unit as the address for “Beilin Xu.”

23. Based on my review of postal records, I know that, as recently as June 22, 2023, “Beilin Xu,” received mail at the Apartment Unit.

24. Based on my review of records from the Online Shipping Platform, I know that prepaid gift cards were typically used to pay for services used by the Vendor-1 Online Shipping Account – that is, cards similar to the one that law enforcement agents observed CC-1 purchase on or about June 8, 2023. However, on at least two occasions, the Vendor-1 Online Shipping Account has paid the Online Shipping Platform by credit card. For example:

a. On or about February 24, 2023, the day that the Vendor-1 Online Shipping Account was created, and two days before Vendor-1 became a vendor on Archetyp, the Vendor-1 Online Shipping Account made a payment of \$8.10 by credit card held in the name of “Beilin Xu.”

b. On or about May 1, 2023, the Vendor-1 Online Shipping Account made a payment of \$300 by credit card held in the name of CC-1.

25. Based on my review of photographs from a CBP database, I know that BEILIN XU, the defendant, matches the appearance of the individual depicted *supra* 18.d, 18.f, 19, 20, who has been observed mailing packages from Flushing Post Office-1 on behalf of Vendor-1. Specifically, the below photograph depicts BEILIN XU, the defendant, at the time that she reentered the United States following an international trip on or about August 14, 2018.



The August 10, 2023 Search of the Apartment Unit

26. On or about August 10, 2023, law enforcement agents executed a search warrant at the Apartment Unit. Based on my personal observations during the execution of that search, my communications with other law enforcement agents, and my review of evidence seized during that search, I know the following:


a. BEILIN XU, the defendant, was located in the master bedroom (the “Bedroom”) when law enforcement agents entered the Apartment Unit. When law enforcement agents entered the Bedroom, they found XU in the Bedroom (specifically, in the bed) and CC-1 in a bathroom connected to the Bedroom and which is only accessible through the Bedroom. CC-1 was attempting to flush a substance in the toilet that, based on my training and experience, appeared to be methamphetamine.

b. Law enforcement agents identified additional suspected controlled substances in the Bedroom, including: (1) in a drawer in a desk in the Bedroom, a clear plastic, Ziploc-style bag containing a substance that, based on my training and experience, appeared to be cocaine; (2) on the ground of the Bedroom, a shopping-style bag that contained a clear plastic bag and another bag containing a substance that, based on my training and experience, appeared to be ketamine; and (3) also on the ground of the Bedroom, another shopping-style bag that contained a clear plastic bag and a multi-colored bag that contained a substance that, based on my training and experience, appeared to be methamphetamine.

c. In the Bedroom, law enforcement agents also identified unused USPS boxes and shipping materials consistent with the packages seized by law enforcement in this case (i.e., Package-1, Package-2, Package-3, Package-4, and Package-5), including stickers depicting the logo of Vendor-1, which had been used to seal boxes within the seized packages, and the rainbow-colored bags which were used by Vendor-1 to hold the controlled substances that were shipped in certain of the seized packages, specifically Package-3 and Package-4.

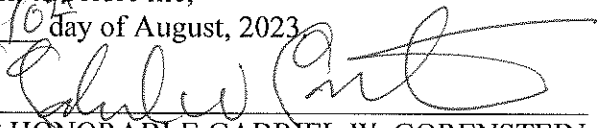
d. In addition, pursuant to the search warrant, law enforcement agents accessed the cellular phone that was located next to the side of the bed where XU was located when law enforcement agents entered the Bedroom. That cellular phone (the "XU Phone") was unlocked using XU's biometric features. Law enforcement agents identified evidence on the XU Phone consistent with XU's operation of Vendor-1, including but not limited to: (1) a screenshot of the Vendor-1 page on a separate dark web marketplace; (2) a chat on a messaging application between XU and an account held in the name of Vendor-1 (and which appears, based on the content of the communications and photographs included in the chat, to be operated by CC-1), in which XU and CC-1 exchanged photographs of what appeared to be controlled substances; and (3) information on the "notes" application of XU's phone containing user names and passwords to accounts which appear to relate to the operation of Vendor-1.

WHEREFORE, I respectfully request that BEILIN XU, the defendant, be imprisoned or bailed, as the case may be.



Ryan Madden
Special Agent
Homeland Security Investigations

Sworn to before me,
this 10th day of August, 2023.



THE HONORABLE GABRIEL W. GORENSTEIN
United States Magistrate Judge
Southern District of New York